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12 *Attorneys for Defendant*  
13 *Wal-Mart Stores, Inc.*

14 UNITED STATES DISTRICT COURT

15 DISTRICT OF NEVADA

16 BERNADETTE CARRIZZO,

17 Plaintiff,

18 v.

19 WAL-MART STORES INC., a foreign  
20 corporation; DOES I through XX; and ROE  
21 CORPORATIONS I through XX, inclusive,

22 Defendants.

Case No.: 2:18-CV-00114-JAD-NJK

**STIPULATED PROTECTIVE ORDER**  
**BETWEEN PLAINTIFF BERNADETTE**  
**CARRIZZO AND DEFENDANT WAL-**  
**MART STORES, INC.**

23 The Parties to this action, Plaintiff BERNADETTE CARRIZZO (hereinafter "Plaintiff") and  
24 Defendant WAL-MART STORES, INC. (hereinafter "Defendant") (collectively, the "Parties"), by  
25 and through their respective counsel of record, hereby stipulate and request that the Court enter a  
26 Stipulated Protective Order as follows:

27 1. This Protective Order shall be entered pursuant to the Federal Rules of Civil Procedure  
28 and applicable Local Rules for the United States District Court for the District of Nevada.

2. This Protective Order shall govern all materials agreed upon as "Confidential" by the  
Parties. Disclosed materials agreed to be "Confidential" in nature shall be designated in writing as  
"Confidential," and such designation may appear on the face of each document or in a separate  
writing. The Parties will use best efforts to limit the number of documents designated as  
"Confidential." "Confidential Information" in this case shall include, but not be limited to, Plaintiff's

1 medical records, Defendant's policies and procedures, Defendant's training materials, and any maps  
2 and/or schematics of the subject Defendant store.

3 3. "Confidential Information" shall be held in confidence by each Party or by his or her  
4 representatives, attorneys, and/or agents for use solely for the purposes of this action and not for any  
5 business purpose. Documents designated as "Confidential" may not be disclosed to persons or parties  
6 whose relationship to the dispute between the Parties is not reasonably related to the prosecution or  
7 defense of claims litigated.

8 4. Each counsel shall be responsible for providing notice of this Protective Order and the  
9 terms herein to persons to whom they disclose "Confidential Information," as defined by the terms of  
10 this Protective Order.

11 5.  
12 See order issued concurrently herewith.

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15 6. The termination of this action shall not relieve the Parties and persons obligated  
16 hereunder from their responsibilities to maintain the confidentiality of Information designated  
17 "Confidential" pursuant to this Protective Order.

18 7. After the final adjudication or resolution of this Lawsuit ("final adjudication" will  
19 include the resolution of any appeals), a Party may make a written demand to the other Party for the  
20 return of "Confidential" materials, including all copies and reproductions thereof. The Party receiving  
21 the written demand shall have thirty (30) days from receipt of the written demand to comply with  
22 same.

23 8. Nothing in this Protective Order shall be deemed to preclude any Party from seeking  
24 and obtaining, on an appropriate showing, a modification of this Protective Order.

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1           9.       To the extent any aspect of this Protective Order may conflict with a subsequent Court  
2 Order or Local Rule, that aspect of this Protective Order is superseded with that Court Order or Local  
3 Rule.

4  
5 DATED this 1st day of March, 2018.

6 **PATERNOSTER LAW GROUP, LLC**

7 */s/ Dustin E. Birch*

8 \_\_\_\_\_  
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14 *Attorneys for Plaintiff*  
15 *Bernadette Carrizzo*

DATED this 1st day of March, 2018.

**PHILLIPS, SPALLAS & ANGSTADT, LLC**

*/s/ Pooja Kumar*

\_\_\_\_\_  
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*Attorneys for Defendant*  
*Wal-Mart Stores, Inc.*

16  
17 **IT IS SO ORDERED.**

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20 \_\_\_\_\_  
21 **UNITED STATES MAGISTRATE JUDGE**

22  
23 **DATED:** March 2, 2018  
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